

DECLARATION OF LINDA BECKER

1 I, Linda Becker, declare as follows:

2 1. The facts stated herein are personally known to me and I have first-hand knowledge
3 thereof. If called upon to do so, I could and would testify hereto under oath.

4 2. I am a member of Markoff Investment LLC, a real property owner within the
5 boundaries of the Fashion District BID.

6 3. As of May 17, 2017, I served as a volunteer on the BID Board. I was not then, nor
7 have I ever been, an employee of the BID. I receive no remuneration from the BID for my
8 volunteer service on the BID Board.

9 4. The BID does not provide me with a computer or access to a BID computer. The
10 BID does not reimburse me for the use of my personal computer or email. When I send or receive
11 email, I do so on my private email domain on my private computer. I do not invite contact or
12 solicitation to my private email address and/or my private telephone number regarding BID
13 business from real property owners in the BID or the public. The BID does not have access to nor
14 the right to control access to my private email domain and/or my private computer and/or private
15 cell phone.

16 5. As of May 17, 2017, I did not have any email communications to or from
17 southpark.la, dlanc.com, delsonproperties.com, South Park BID, DLANC, Delson, or Michael
18 Delijani, in my private email that pertained to my role as a BID Board Member. I did not delete
19 emails because of any CPRA request.

20 6. As of July 7, 2017, I did not have any email communication to or from Urban Place
21 Consulting Inc. in my private email that pertained to my role as a BID Board Member. I did not
22 delete email because of any CPRA request.

23 7. I try to delete emails after I have read them unless I need them for future use.

24 8. As does every other real property owner within the boundaries of the Fashion
25 District BID, I have a right to communicate regarding issues of concern to me as a real property
26 owner in the BID, and simply because I serve as a volunteer on the BID Board does not make
27 those communications BID business or subject to the CPRA.

28 9. At the time of Mr. Riskin's request for all 2017 emails in my possession "that relate
to the operation of the BID" on July 31, 2017, I had no 2017 emails in my possession that relate to
the operation of the BID. I had one email, a true and correct copy of which is attached hereto and
will be provided to the Court for in camera inspection as Exhibit 9, from an employee of the BID,

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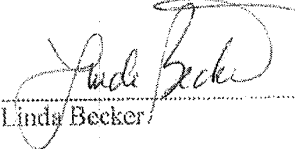
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1 but it does not relate to the operation of the BID. This email, as evidenced on its face, is a
2 personal email from a friend seeking a legal referral on a matter that neither the BID nor the BID
3 Board has any interest or jurisdiction over, with additional personal information regarding the
4 health of a family member. I would never disclose this email to Riskin. This email is neither
5 necessary or convenient to my role as a BID Board member. It was not retained as a memorial of
6 informational content for public reference. Simply put, I had no emails that are responsive to
7 Riskin's request.

8 I did not delete emails because Riskin requested them.

9 I declare under penalty of perjury under the laws of the State of California that the
10 foregoing is true and correct.

11 Executed on this 25 day of May, 2019, at Los Angeles, California.

12 
13 Linda Becker

1 9. As a business owner, I receive at least 300 unsolicited emails to my private email
2 on a daily basis. I do not read emails from individuals I do not know, and I delete hundreds of
3 emails every day because they are unsolicited; the remaining emails I read and delete unless there
4 is some reason I need to keep them.

5 10. More than most of my communications pertaining to my position as a member and
6 Chair of the Board of the Los Angeles Fashion District BID occur in BID meetings. Occasionally
7 I receive emails from BID staff, for example a reminder of a Board meeting or a copy of the
8 Agenda for a Board meeting, but it remains in my private email only long enough for me to read
9 it, and/or print the Agenda.

10 11. I am aware that in the present lawsuit, there is an issue about an email from Estella
11 Lopez to me regarding the Skid Row Neighborhood Council. That email has nothing to do with
12 BID business or my position as a member or Chair of the Board of the BID. I am one of a number
13 of property owners in the City of Los Angeles who do fall within the proposed Skid Row
14 Neighborhood Council boundaries, but not all property owners in the BID would fall under the
15 attempted jurisdiction of the Skid Row Neighborhood Council. The Skid Row Neighborhood
16 Council is not a subject that is BID business. The BID Board has never discussed the Skid Row
17 Neighborhood Council. I was interested in the Skid Row Neighborhood Council in my individual
18 capacity as a real property owner, not as a BID Board Member. Estela Lopez sent me an email in
19 my individual capacity, based on my personal interest as a potentially affected real property
20 owner. That email from Estela Lopez has nothing to do with BID business or my position as a
21 member or Chair of the BID Board.

22 12. Notwithstanding the foregoing, on May 17, 2017, I no longer had that email from
23 Ms. Lopez.

24 13. I did not delete any emails because Riskin asked for them. My practice of retaining
25 or deleting emails has not changed because Riskin has asked for my emails or because he has sued
26 the BID.

27 I declare under penalty of perjury under the laws of the State of California that the
28 foregoing is true and correct.

Executed on this 28th day of May, 2019.

Mark Chatoff

Mark Chatoff

I, Jose Gonzalez, declare as follows:

2. I am the Finance Manager for the Downtown Los Angeles Property Owners Association. I have held this position for the past fifteen (15) years. Among my other responsibilities, I assist the Executive Director, Rena Leddy, in preparing the BID's budgets, and commencing in 2017, I assisted Ms. Leddy in the BID's renewal process.

4. At Ms. Leddy's request, I searched for emails to or from Urban Place Consulting Group Inc., excluding Ms. Leddy's emails to or from Urban Place Consulting Group Inc., in response to Mr. Riskin's July 7, 2017, CPRA request for "I'd like to see all emails between anyone at UPC and anyone at the BID (staff and board) exclusive of you [Ms. Leddy] from January 1, 2017 to whenever you comply with this request." I performed a search of my computer, and informed Ms. Leddy that I believed the emails I located constituted deliberative process. In particular, Urban Place Consulting Group Inc. and I were assisting Ms. Leddy in evaluating various special assessment methodologies for the renewal of the BID contract with the City of Los Angeles. Ms. Leddy ultimately made a policy recommendation to the BID Board, which was accepted, and the final special assessment methodology is described and explained in the Management Plan, a copy of which is attached hereto as Exhibit 4. These emails had nothing to do with illegal lobbying.

[Handwritten signature]

José Gonzalez

DECLARATION OF MATTHEW HAYERIM

1 I, Matthew Hayerim, declare as follows:

2 1. The facts stated herein are personally-known to me and I have first-hand
3 knowledge thereof. If called upon to do so, I could and would testify hereto under oath.

4 2. I am the owner of real property within the boundaries of the Fashion District BID.

5 3. As of May 17, 2017, I served as a volunteer on the BID Board of Directors. I was
6 not then, nor have I ever been, an employee of the BID. I receive no remuneration from the BID
7 for my volunteer service on the BID Board.

8 4. The BID does not provide me with a computer or access to a BID computer. The
9 BID does not reimburse me for the use of my personal computer or email. When I send or receive
10 email, I do so on my private email domain on my private computer. I do not invite contact or
11 solicitation to my private email address and/or my private telephone number regarding BID
12 business from real property owners in the BID or the public. The BID does not have access to nor
13 the right to control access to my private email domain and/or my private computer and/or private
14 cell phone.

15 5. As of May 17, 2017, I did not have any email communications to or from
16 southpark.la, dlanc.com, delsonproperties.com, South Park BID, DLANC, Delson, or Michael
17 Delijani, in my private email that pertained to my role as a BID Board Member. I did not delete
18 emails because of any CPRA request.

19 6. As of July 7, 2017, I did not have any email communication to or from Urban Place
20 Consulting Inc. in my private email that pertained to my role as a BID Board Member. I did not
21 delete email because of any CPRA request.

22 7. I do not keep emails after I have read them unless I need them for future use.

23 8. As does every other real property owner within the boundaries of the Fashion
24 District BID, I have a right to communicate regarding issues of concern to me as a real property
25 owner in the BID, and simply because I serve as a volunteer on the BID Board does not make
26 these communications BID business or subject to the CPRA.
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BRADLEY & GMEICH LLP

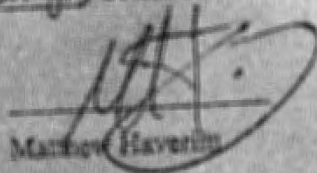


BRADLEY & GMEICH LLP

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 23 day of May, 2019, at Los Angeles California.


Matthew Haverlin

DECLARATION OF STEVE HIRSH

1 I, Steve Hirsh, declare as follows:

2 1. The facts stated herein are personally-known to me and I have first-hand
3 knowledge thereof. If called upon to do so, I could and would testify hereto under oath.

4 2. I am an owner of Cooper Design Center and a real property owner within the
5 boundaries of the Fashion District BID.

6 3. As of May 17, 2017, I served as a volunteer on the BID Board of Directors. I was
7 not then, nor have I ever been, an employee of the BID. I receive no remuneration from the BID
8 for my volunteer service on the BID Board.

9 4. The BID does not provide me with a computer or access to a BID computer. The
10 BID does not reimburse me for the use of my personal computer or email. When I send or receive
11 email, I do so on my private email domain on my private computer. I do not invite contact or
12 solicitation to my private email address and/or my private telephone number regarding BID
13 business from real property owners in the BID or the public. The BID does not have access to nor
14 the right to control access to my private email domain and/or my private computer and/or private
15 cell phone.

16 5. As of May 17, 2017, I did not have any email communications to or from
17 southpark.la, dlanc.com, delsonproperties.com, South Park BID, DLANC, Delson, or Michael
18 Delijani, in my private email that pertained to my role as a BID Board Member. I did not delete
19 emails because of any CPRA request.

20 6. As of July 7, 2017, I did not have any email communication to or from Urban Place
21 Consulting Inc. in my private email that pertained to my role as a BID Board Member. I did not
22 delete email because of any CPRA request.

23 7. I do not keep emails after I have read them unless I need them for future use.

24 8. As does every other real property owner within the boundaries of the Fashion
25 District BID, I have a right to communicate regarding issues of concern to me as a real property
26 owner in the BID, and simply because I serve as a volunteer on the BID Board does not make
27 those communications BID business or subject to the CPRA.
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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

LOS ANGELES

Executed on this 23 day of May, 2019, at _____, California.


Steve Hirsh

DECLARATION OF ELISA KELLER

I, Elisa Keller, declare as follows:

1. The facts stated herein are personally-known to me and I have first-hand knowledge thereof. If called upon to do so, I could and would testify hereto under oath.

2. I am a member of Maple & Griffith Properties LLC, a real property owner within the boundaries of the Fashion District BID.

3. As of May 17, 2017, I served as a volunteer on the BID Board of Directors. I was not then, nor have I ever been, an employee of the BID. I receive no remuneration from the BID for my volunteer service on the BID Board.

4. The BID does not provide me with a computer or access to a BID computer. The BID does not reimburse me for the use of my personal computer or email. When I send or receive email, I do so on my private email domain on my private computer. I do not invite contact or solicitation to my private email address and/or my private telephone number regarding BID business from real property owners in the BID or the public. The BID does not have access to nor the right to control access to my private email domain and/or my private computer and/or private cell phone.

5. As of May 17, 2017, I did not have any email communications to or from southpark.la, dlanc.com, delsonproperties.com, South Park BID, DLANC, Delson, or Michael Delijani, in my private email that pertained to my role as a BID Board Member. I did not delete emails because of any CPRA request.

6. As of July 7, 2017, I did not have any email communication to or from Urban Place Consulting Inc. in my private email that pertained to my role as a BID Board Member. I did not delete email because of any CPRA request.

7. I do not keep emails after I have read them unless I need them for future use.

8. As does every other real property owner within the boundaries of the Fashion District BID, I have a right to communicate regarding issues of concern to me as a real property owner in the BID, and simply because I serve as a volunteer on the BID Board does not make those communications BID business or subject to the CPRA.

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 23rd day of May, 2019, at Los Angeles, California.



Elisa Keller

DECLARATION OF LISA KORBATOV

1 I, Lisa Korbato, declare as follows:

2 1. The facts stated herein are personally-known to me and I have first-hand
3 knowledge thereof. If called upon to do so, I could and would testify hereto under oath.

4 2. I am the owner of Fisch Properties and a real property owner within the boundaries
5 of the Fashion District BID.

6 3. As of May 17, 2017, I served as a volunteer on the BID Board of Directors. I was
7 not then, nor have I ever been, an employee of the BID. I receive no remuneration from the BID
8 for my volunteer service on the BID Board.

9 4. The BID does not provide me with a computer or access to a BID computer. The
10 BID does not reimburse me for the use of my personal computer or email. When I send or receive
11 email, I do so on my private email domain on my private computer. I do not invite contact or
12 solicitation to my private email address and/or my private telephone number regarding BID
13 business from real property owners in the BID or the public. The BID does not have access to nor
14 the right to control access to my private email domain and/or my private computer and/or private
15 cell phone.

16 5. As of May 17, 2017, I did not have any email communications to or from
17 southpark.la, dlanc.com, delsonproperties.com, South Park BID, DLANC, Delson, or Michael
18 Delijani, in my private email that pertained to my role as a BID Board Member. I did not delete
19 emails because of any CPRA request.

20 6. As of July 7, 2017, I did not have any email communication to or from Urban Place
21 Consulting Inc. in my private email that pertained to my role as a BID Board Member. I did not
22 delete email because of any CPRA request.


23 7. I do not keep emails after I have read them unless I need them for future use.

24 8. As does every other real property owner within the boundaries of the Fashion
25 District BID, I have a right to communicate regarding issues of concern to me as a real property
26 owner in the BID, and simply because I serve as a volunteer on the BID Board does not make
27 those communications BID business or subject to the CPRA.
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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 22nd day of May, 2019, at San Mateo, California.


Lisa Korbatov

DECLARATION OF MICHAEL KUNKEL

I, Michael Kunkel, declare:

1. The facts stated herein are personally known to me and I have first-hand knowledge of thereof. If called upon to do so, I could and would testify competently thereto under oath.

2. I am the Director of Investigative Services of Setec Security Technologies, Inc. ("Setec"). My job responsibilities entail providing litigation support to attorneys and project management of Setec's computer forensic and electronic discovery specialists who work in our business unit, Setec Investigations, which specializes in the discovery, collection, investigation, and production of electronic information for investigating and handling computer-related crimes and misuse.

3. In my role with Setec, I work with government entities, local, state, and federal law enforcement agencies, private attorneys, and corporations, and specialize specifically in managing computer forensic investigations and providing thorough litigation support solutions. I have been involved in over 1000 computer forensic investigations and electronic discovery engagements surrounding theft of intellectual property, trade secret misappropriation, financial fraud, email and Internet abuse, employee disputes, copyright infringement, industrial espionage, disputed dismissals, software code reviews, spoliation, and large data set management among other engagements.

4. I maintain membership in the Information Systems Security Association (ISSA) and I hold certifications as a Certified Information Security Systems Professional (ISC²) as well as an EnCase Certified Examiner (Guidance Software).

5. Previously, I was a Special Agent in the United States Air Force Office of Special Investigations where I investigated computer related crime and cyber counterintelligence for the Department of Defense. I have excelled in over 500 hours of classroom instruction on computer crime investigative techniques and I was a Department of Defense-certified Computer Crime Investigator and Computer Forensic Examiner from the Defense Cyber Investigations Training Academy. I was responsible for computer investigations covering the Western Coast of the United States as well as the entire US Air Force interest in the Asia/Pacific region. I also utilized my computer investigative expertise during the Global War on Terror in Iraq to identify and neutralize terrorist threats to the United States in a Joint Special Operations Task Force.

6. Setec's experts in general, and myself in particular, have participated in and led countless computer forensic investigations and electronic discovery efforts to facilitate the discovery of electronic evidence in support of criminal and civil lawsuits. I am regularly designated as an

1 expert providing expert testimony in computer forensics and electronic discovery providing expert
2 testimony.

3 7. I have been asked by Attorney Carol Humiston to explain to the Court the security
4 and privacy issues associated with providing metadata associated with email.

5 8. Every document created on an electronic device, like a computer, has metadata
6 imbedded in it. Metadata is data about data.

7 9. Email metadata can be described as having two levels.

8 10. The first level of email metadata reflects the body of the email, subject line, to, from,
9 time stamp, cc, bcc, and attachments. Exhibit 11, attached, has the first level of metadata marked
10 with the color red.

11 11. The second level of email metadata is called the internet routing header. Exhibit 12
12 has the second level of metadata marked with the color yellow. The internet routing information
13 contains the IP address of the device used to send the email, the name of the exchange server, the
14 server names through which the email passed to get from the sender to the recipient, the time the
15 email was sent and passed through each server and ultimately reached the recipient, and the routing
16 security system, if any.

17 12. The metadata that constitutes the internet routing header can be used to compromise
18 the device on which the email is created and the exchange server from which it was sent.

19 13. Knowledge of the IP address creates a target for computer intrusion and cyberattack.
20 Likewise, knowledge of the name of the exchange server, depending upon the server, creates a target
21 for computer intrusion and cyberattack. Among other things, armed with this information, a hacker
22 may take control of a computer. This means a hacker can see and access emails, photographs,
23 passwords, browsing history, financial and tax records, credit card information and charges, etc., on
24 the email sender's computer. The hacker can send emails or documents from the computer. In short,
25 the hacker can take over the computer as if he/she is the owner, performing any transaction that the
26 owner could perform. In addition to all of the foregoing, a hacker can install malware, viruses,
27 trojans, worms, and other malicious code. A hacker can encrypt data and hold it for ransom
28 ([https://www.wsj.com/articles/hackers-breach-college-applicant-databases-seek-ransom-](https://www.wsj.com/articles/hackers-breach-college-applicant-databases-seek-ransom-11552003816)
[11552003816](https://www.wsj.com/articles/hackers-breach-college-applicant-databases-seek-ransom-11552003816)) or participate in cryptojacking([http://fortune.com/2019/03/02/ibm-ransomware-](http://fortune.com/2019/03/02/ibm-ransomware-cybercrime-cryptojacking/)
[cybercrime-cryptojacking/](http://fortune.com/2019/03/02/ibm-ransomware-cybercrime-cryptojacking/)). A hacker can mount a denial of service attack on the router, causing
network connections to slow down or break
([https://timesofsandiego.com/crime/2019/02/12/members-of-hacker-collective-charged-in-threats-](https://timesofsandiego.com/crime/2019/02/12/members-of-hacker-collective-charged-in-threats-against-san-diego-schools/)
[against-san-diego-schools/](https://timesofsandiego.com/crime/2019/02/12/members-of-hacker-collective-charged-in-threats-against-san-diego-schools/)).

14. In addition, knowledge of the routing security system is valuable information to any hacker, because armed with that information, a hacker can investigate the flaws in a security system and how to circumvent it.

15. Metadata is often cited as evidence of the legitimacy or authenticity of an email, but this is a fallacy. A sent email can easily be altered without affecting the metadata. Attached as Exhibit 13 is an email sent to me by Ms. Humiston; Exhibit 14 is its metadata for Exhibit 13. I took that email and I altered it, which I have attached as Exhibit 15. Exhibit 16 is the metadata for Exhibit 15 (after I altered Exhibit 13). Note that the metadata is the same even though I altered the email.

I declare under the penalty of perjury under the laws of the State of Texas that the foregoing is true and correct, and that this declaration was executed on May 23, 2019, at Dallas, Texas.

Michael Kunkel

DECLARATION OF YUL KWON

I, Yul Kwon, declare as follows:

1. The facts stated herein are personally-known to me and I have first-hand knowledge thereof. If called upon to do so, I could and would testify hereto under oath.

2. I was the owner of Freeway Apparel, and I am the current co-owner of Loomble, and a real property owner within the boundaries of the Fashion District BID.

3. As of May 17, 2017, I served as a volunteer on the BID Board of Directors. I was not then, nor have I ever been, an employee of the BID. I receive no remuneration from the BID for my volunteer service on the BID Board.

4. The BID does not provide me with a computer or access to a BID computer. The BID does not reimburse me for the use of my personal computer or email. When I send or receive email, I do so on my private email domain on my private computer. I do not invite contact or solicitation to my private email address and/or my private telephone number regarding BID business from real property owners in the BID or the public. The BID does not have access to nor the right to control access to my private email domain and/or my private computer and/or private cell phone.

5. As of May 17, 2017, I did not have any email communications to or from southpark.la, dlanc.com, delsonproperties.com, South Park BID, DLANC, Delson, or Michael Delijani, in my private email that pertained to my role as a BID Board Member. I did not delete emails because of any CPRA request.

6. As of July 7, 2017, I did not have any email communication to or from Urban Place Consulting Inc. in my private email that pertained to my role as a BID Board Member. I did not delete email because of any CPRA request.

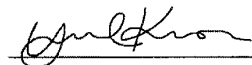
7. I do not keep emails after I have read them unless I need them for future use.

8. As does every other real property owner within the boundaries of the Fashion District BID, I have a right to communicate regarding issues of concern to me as a real property owner in the BID, and simply because I serve as a volunteer on the BID Board does not make those communications BID business or subject to the CPRA.

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 22 day of May, 2019, at Los Angeles, California.



Yul Kwon

DECLARATION OF RENA LEDDY

I, Rena Leddy, declare:

1. The facts stated herein are personally-known to me and I have first-hand knowledge thereof. If called upon to do so, I could and would competently testify hereto under oath.

2. I am the Executive Director of the Downtown Los Angeles Property Owners Association, which administers the Fashion District Business Improvement District ("BID"), and I have held that position since September 1, 2016. I held the position of Managing Director of the Los Angeles Fashion District BID from January 6, 2015, to July 31, 2016, and Interim Executive Director from August 1, 2016 to August 31, 2016. For the past 26 years I have worked on behalf of 39 public entities and public agencies, for which I have been involved in creating or renewing a BID on behalf of 14 of them.

3. The Downtown Los Angeles Property Owners Association is a California nonprofit corporation—an "owners association" within the meaning of California Streets and Highways Code § 36612—which manages the Fashion District Property-Based Business Improvement District ("BID") under contract with the City of Los Angeles. A true and correct copy of the Agreement between the Los Angeles Property Owners Association, in effect in 2017, is attached hereto as Exhibit 2. The BID was first established in 1996, pursuant to California Streets and Highways Code §§ 36600 *et seq.* Thereafter, the real property owners within the BID voted to renew the BID effective January 1, 1999 through 2003, January 1, 2004 through 2008, January 1, 2009 through 2013, January 1, 2014 through 2018, and most recently, effective January 1, 2019, for an additional eight (8) years.

4. The purpose of the BID is to provide programs, services, and special benefits to real property parcels within the boundaries of the BID that the City of Los Angeles does not provide, with the intent to improve economic development, increase building occupancy and lease rates, encourage new business development, attract residential/hotel business and services, attract office, retail and residential tenants, attract retail and wholesale customers, among others. In furtherance of this purpose, the BID provides "clean" services, including sidewalk sweeping and

1 pressure washing, graffiti and handbill removal, pedestrian trash removal, tree trimming, and
2 landscape programs. The BID provides “safe” services, including licensed security guards
3 performing bicycle, night vehicle, and foot patrol to observe, report and interface with the Los
4 Angeles Police Department. The BID provides “communication” services, including destination
5 marketing, economic development, media relations, advocacy, and BID stakeholder
6 communications. The BID’s services and programs are not to supplant City of Los Angeles
7 services but to add extra services.

8 5. In order to finance the programs and services provided to benefit the real property
9 parcels within the BID boundaries, a special assessment is levied against each parcel on a yearly
10 basis. California Constitutional law mandates that the amount of that special assessment not be
11 based on property value. Instead, the special assessment must be commensurate with the special
12 benefit each real property parcel receives. There are three criteria on which the special assessment
13 can be levied: (1) lot square footage; (2) street front footage; and (3) building square footage.
14 However, what weight to be given to each of these three criteria is within the discretion of the BID
15 property owners within the boundaries of the proposed BID. In addition, where some real
16 properties within the BID boundaries receive more services than others, the BID is permitted to
17 designate benefit zones, and the real property parcels within those benefit zones are assessed
18 additional levies.

19 6. The BID is managed on a day-to-day basis by me. There is a 15-member volunteer
20 Board of Directors. There are currently 2286 privately-owned real property parcels and 21
21 publicly-owned real property parcels who receive special benefit from the BID, each one of which
22 must pay a yearly special assessment.

23 7. In January 2017, the BID’s term limit and approved contract with the City of Los
24 Angeles was set to expire as of December 31, 2018. Attached hereto as Exhibit 2 is a true and
25 correct copy of the BID’s contract with the City of Los Angeles in effect in 2017. The process of
26 renewing the BID’s term and contract is time-consuming and costly. The BID must prepare a
27 Management Plan, which identifies, among other things: (1) the boundaries of the BID; (2) any
28 expansion of the BID boundaries; (3) the priorities for programs and services to be provided; (4)

1 based on the priorities, the program and services budget, which generally constitutes the total
2 assessment to be collected, for the first year of renewal; (5) the selection of benefit zones, and the
3 justification therefore; (6) an operating budget for the number of renewed years; (7) the
4 assessment methodology formula, to wit, how the BID determined each real property parcel's
5 proportionate share of the special benefit; and (8) the assessment rate calculations. In addition,
6 California law requires that an Engineer's Report be prepared to determine the boundaries of the
7 BID, to ensure special benefit vs. general benefit, and to calculate the lot square footage, the street
8 front footage, and the building square footage for each real property parcel.

9 8. Procedurally, once the Management Plan and the Engineer's Report have been
10 completed, they are submitted to the Los Angeles City Clerk, for approval. Once approved, the
11 City Clerk recommends to the City Council that the Petition for renewal plus the two plans be sent
12 to the real property owners for signature on the Petition. The property owners then vote to assess
13 themselves. The Petition for renewal must be signed by real property owners representing 50% of
14 the total special assessment to be paid. Once the 50% threshold is met, the City Clerk
15 recommends to the City Council that it issue a Prop 218 ballot. The real property owners then
16 vote to renew the BID or not, and that too is weighted by the total special assessment to be paid.
17 Once the Prop 218 threshold is met, the City Clerk submits the ballot results to the City Council
18 and recommends establishing the BID. There is an opportunity for public comment at the City
19 Council meeting at each phase of the process, but for the most part, this process is between the
20 City Clerk and the City Council.

21 9. As the Executive Director of the BID, I oversaw the BID renewal process, with the
22 significant assistance of the BID's Finance Manager, Jose Gonzalez, and feedback from a renewal
23 committee made up of private property owners within the proposed boundaries of the BID.

24 10. As the Executive Director of the BID, it was my responsibility to make the ultimate
25 policy recommendations as to: (1) how long the BID would seek renewal for; (2) the priorities for
26 programs and services on which the BID budget, operating budget for the full renewal period, and
27 the special assessments would be based; (3) how many benefit zones would be included, and what
28 those benefit zones would be; (4) whether and under what circumstances the BID boundaries

1 should be increased; (6) what the BID budget for 2019 should be, as well as the projected
2 operating budget for the remainder of the BID renewal years; (7) and the assessment methodology.
3 All the foregoing variables are interconnected, each one impacting the next, and all ultimately
4 impacts the special assessment levied on each real property parcel.

5 11. As the Executive Director, my goal was to provide the best possible programs and
6 services to each real property owner at the most equitable and reasonable price. The process of
7 meeting that goal required input and assistance from many sources. One of those was Urban Place
8 Consulting Group Inc.

9 12. In or about January 2017, the BID contracted with Urban Place Consulting Group
10 Inc. to assist the BID in the renewal process, based on its reputation and past experience in
11 working with the BID renewal process. A true and correct copy of the contract between the BID
12 and Urban Place Consulting Group Inc. is attached hereto as Exhibit 3. Urban Place Consulting
13 Group Inc. worked with me and Mr. Gonzalez to evaluate and provide feedback on key variables
14 and how those variables impacted each real property parcel's special assessment. I sought and
15 required the best, most complete, most accurate, and most honest feedback from Urban Place
16 Consulting Group Inc. on which I could make my policy recommendations, some of which are
17 identified in Paragraph 8 above.

18 13. Urban Place Consulting Group Inc. prepared the Management Plan which details
19 the policy decisions which ultimately resulted in the special assessment methodology. A true and
20 correct copy of the Management Plan is attached hereto as Exhibit 4. Commencing on Page 17 of
21 the Management Plan, a very detailed explanation of the methodology that was used to determine
22 the special assessment for each real property parcel is provided.

23 14. I and Mr. Gonzales had many pre-decisional communications with Aaron Aulenta
24 and Steve Gibson at Urban Place Consulting Group Inc. during the renewal process, most in
25 person and on the telephone, but some via email. All of those communications were in furtherance
26 of obtaining the best, most complete, most accurate, and most honest input, based on their
27 experience and their manipulation of the variables, in order for me to make my policy
28 recommendations to achieve the most equitable special assessment for each parcel. Free

1 communication between and among the BID and Urban Place Consulting Group Inc. was critical
2 in this process.

3 15. It is difficult to simplify the calculations and discretionary considerations that go
4 into determining each real property parcel's special assessment; hence the reason Urban Place
5 Consulting Group Inc. was so valuable. For every special benefit provided, there was a
6 complicated analysis of each real property parcel's proportionate share of the cost. Each current
7 program was reviewed and costs forecasted for the 1st year of the new BID. A recommendation
8 needed to be made about increasing or decreasing each program, or adding new programs. Each
9 program needed to be analyzed as to its benefits to each real property parcel. It was necessary to
10 evaluate whether there were differences in program benefits based on geography within the BID or
11 type of real property parcel. For example, in the 2019 renewal, the BID went from nine (9) benefit
12 zones to one (1) benefit zone, but it took several calculations and changes to the database to get
13 there. Each of these changes needed to be reviewed to insure fairness and equity throughout the
14 BID. Then layered on top of all those issues is the reality that every real property owner has
15 his/her own unique financial condition, and if the special benefits derived are not perceived to be
16 worth the special assessment, then there will be insufficient votes to renew the BID contract. Of
17 course if the BID contract is not renewed, then all the real property parcels within the BID are
18 denied the special benefits. The number of substantive and discretionary factors that weighed in
19 my policy recommendation for the special assessment methodology required the assistance of
20 Urban Place Consulting Inc.

21 16. All of the policy recommendations that I made as a result of consulting with Urban
22 Place Consulting Group Inc. are a matter of public record. The Management Plan (Exhibit 4)
23 reflects each of those recommendations, explains them, and reflects their adoption by the BID
24 Board at its August Board meeting, of which Riskin was given notice and can access the meeting
25 minutes. Additionally, the Management Plan can be found at fashiondistrict.org and
26 <https://clerk.lacity.org/business-improvement-districts>

27 17. As reflected in the Management Plan, these policy recommendations included
28 increasing the BID boundaries, identifying priorities in programs and services and the projected

1 budget, the decrease in BID assessment zones from the existing nine down to one (plus the Santee
2 Alley overlay), and the weight given to the three variables on which special assessments are
3 permitted. Not every real property owner is completely happy with how the variables were
4 balanced and the impact of that balancing on their own special assessment, but the real property
5 owners did vote to renew the BID by 86%, and by so doing, voted for their special assessment
6 being levied.

7 18. To date, the BID has received 78 CPRA requests from Riskin, with multiple
8 Subparts, and multiple Subparts of Subparts. Every one of these CPRA requests has received a
9 response. This does not include the BID's compliance with Riskin's requests under the Brown
10 Act. The equivalent of more than 5,000 pages of records have been produced to Riskin.

11 19. The BID does not have an email management system or e-discovery module. I
12 cannot perform a system wide search of emails. In 2017, the BID had four employees in the
13 administrative offices and three in the field office, and whenever Riskin asks for emails, every
14 BID employee, both administrative and field, must search their own emails for the records sought.
15 I do not rely on or permit BID employees to self-edit their identification of emails. That means,
16 for the protection and privacy of BID employees, I must read every email identified by any BID
17 employee to determine whether exemptions apply, and what if any redactions are appropriate. My
18 best estimate is that between 2015 and 2017, I spent an average of 10 hours per week on
19 responding to Riskin's CPRA requests, each employee spent, depending upon the nature of the
20 request, 1-4 hours per week on searching for records requested by Riskin, and my assistant spent
21 an average of 16 hours a week compiling and producing the records to Riskin. This level of time
22 is unreasonable in light of the scope of the responsibilities we all have, but nonetheless, I have
23 never told Riskin that we will not respond because of the scope of his requests. I have told Riskin,
24 with certain exceptions, that we will respond to his requests in the order received because it is not
25 possible to accurately respond to Riskin's CPRA requests if more than one search and inspection
26 is being conducted at the same time. The BID's IT consultant did advise that the BID could
27 decrease its email storage costs and Outlook would work faster if emails were deleted. For this
28 reason, I have advised employees that emails which do not contain content that is necessary for

1 them to do their jobs effectively can be deleted, either after they have read them or by using an
2 automatic deletion system after a preset time. Having reviewed thousands of emails in response to
3 Riskin's CPRA requests, it is apparent to me that some employees are more consistent in deleting
4 emails than others. But when emails are requested under the CPRA and in existence, they are
5 produced, absent an exemption.

6 20. On May 17, 2017, Riskin emailed three (3) CPRA requests, to wit: 1. "All emails
7 between anyone at the BID and anyone at either southpark.la, dlanc.com, or anyone at either the
8 South Park BID or DLANC using any email address whatsoever, from January 1, 2016 through
9 May 15, 2017." 2. "All emails in the possession of Mark Chatoff from 2017 that relate in any
10 way to the operations of the BID." 3. "Any emails between anyone at the BID and anyone at
11 delson properties.com or anyone at Delson using any email address whatsoever, including Michael
12 Delijani, from January 1, 2016 through May 15, 2017." I responded properly and accurately to
13 Riskin's three (3) CPRA requests. At issue here, I responded to the CPRA requests seeking, "All
14 emails between anyone at the BID and anyone at either southpark.la. dlanc.com, or anyone at
15 either the South Park BID or DLANC using any email address whatsoever, from January 1, 2016
16 through May 15, 2017" and "All emails in the possession of Mark Chatoff from 2017 that relate
17 in any way to the operations of the BID." All records were produced without exemptions. Riskin
18 subsequently, on July 17, 2017, asked whether any records were being withheld because of
19 exemptions; I had not raised any exemptions in response to the May 17, 2017 CPRA request. On
20 July 17, 2017, when I received Riskin's email, I was responding to Riskin's July 7, 2017 CPRA
21 request where I was raising the deliberative process exemption for emails between the BID and
22 UPC (discussed in Paragraph 21 below). I was thinking about my July 17, 2017 response to
23 Riskin's July 7, 2017 request, and I responded that any records withheld were because of the
24 deliberative process privilege. In fact, no records were withheld in response to the May 17, 2017
25 CPRA request. Rather they were withheld based on the deliberative process privilege with respect
26 to Riskin's July 7, 2017 CPRA request. All responsive records were produced in response to
27 Riskin's May 17, 2017 CPRA request, but no emails in the possession of Mark Chatoff were
28 produced because there were none.

1 21. On July 7, 2017, Riskin emailed four (4) CPRA requests, to wit: 1. "I would like to
2 look at all communications between Urban Place Consulting and the City of Los Angeles made
3 pursuant to UPC's contract with the FDBID to handle BID renewal. I'd like to see these from
4 April 1, 2017 through whenever you comply with this request. If any of these communications are
5 in the form of email, I'd like to see them in their native format, although the PDFs with attached
6 attachments you have sent me in the past are acceptable. Also, I need to see any attachments to
7 emails in their own native formats." 2. "I'd like to see all emails between anyone at UPC and
8 anyone at the BID (staff and board) exclusive of you from January 1, 2017 through whenever you
9 comply with this request. I need these in either native format with attachments included or in that
10 specific PDF format you use which includes embedded attachments." 3. "Can I have a copy of
11 Tara Devine's response to the BID's RFQ for renewal consultants?" 4. "I'd like to take a look at
12 all emails (in the usual format(s)) in the possession of Linda Becker that have to do with the BID's
13 current renewal process." I responded properly and accurately to Riskin's four (4) CPRA
14 requests. At issue here, I responded to the CPRA requests seeking, "I'd like to see all emails
15 between anyone at UPC and anyone at the BID (staff and board) exclusive of you from January 1,
16 2017 through whenever you comply with this request. I need these in either native format with
17 attachments included or in that specific PDF format you use which includes embedded
18 attachments." With respect to this particular request (note that my emails were specifically
19 excluded, although Riskin made this request with respect to me in a July 31, 2017 CPRA request),
20 Jose Gonzalez identified a few emails in his search. Mr. Gonzalez informed me he thought his
21 emails were exempt from disclosure under the deliberative process privilege, and upon review of
22 these emails, I concurred. On July 17, 2017, I informed Mr. Riskin that the emails he sought were
23 exempt from disclosure under the deliberative process privilege, but any non-exempt emails would
24 be produced in the next two weeks. Mr. Riskin responded that "claims of 'deliberative process' as
25 an exemption cannot stand up to the primacy of the public interest in understanding how the BID
26 and UPC lobby the City in support of the various ordinances which must be passed by Council to
27 renew your BID. I hope you will take the statements in LAMC 48.01 about this interest into
28 account before making any claims about the public interest in withholding these communications.

1 As I'm sure you're aware, 'public interest' is not an exemption allowed by CPRA and Section
 2 6255(a) requires a weighing of interests." I responded that "I have determined again that the
 3 exemption raised applies." After a diligent search, no responsive records were produced because
 4 all fell within the deliberative process privilege. Close to 1 ½ months later, Mr. Riskin emailed,
 5 "If you've decided to do a proper search with respect to this request, can you please supply the
 6 result in a native email format rather than as a PDF?" No response was made to this email. Jose
 7 Gonzalez's emails reflect pre-decisional communications with Urban Place Consulting Group Inc.
 8 pertaining to the policy recommendations that I was required to make about the special assessment
 9 methodology.

10 22. On July 31, 2017, Riskin emailed seven (7) CPRA requests. I responded properly
 11 and accurately to Riskin's seven (7) CPRA requests, to wit: 1. "All emails between anyone at the
 12 FDBID and anyone at the City of LA including LAPD from July 2017." 2. "All emails between
 13 you and anyone at Urban Place Consulting from July 2017." 3. "All Emails between anyone at the
 14 FDBID and any other party from July 2017 that mention any of: a. Skid Row; b. neighborhood
 15 Council; c. Albrektson; d. General Jeff; e. Jeff Page; f. Rocky; g. Delgadillo; h. Liner; i. Matthew
 16 Nichols." 4. All emails between anyone at the FDBID and anyone at the Historic Core BID, the
 17 Downtown Center BID, or the Downtown Industrial District BID from July 2017. 5. All emails
 18 between anyone at the BID and anyone at delsonproperties.com or anyone with the name
 19 "Delijani" using any email address whatsoever, including Michael Delijani, from July 2017." 6.
 20 "All emails to/from/cc/bcc anyone on the FDBID board of directors and you from July 2017." 7.
 21 "I'd like copies of all 2017 emails in the possession of Linda Becker that relate to the operation of
 22 the BID." At issue here, I responded to the CPRA request seeking, "I'd like copies of all 2017
 23 emails in the possession of Linda Becker that relate to the operation of the BID." I told Riskin
 24 there were no records responsive to this request. Then in August, Riskin informed me that I must
 25 be lying because I surely had sent an email to Ms. Becker in August to advise of the Board
 26 Meeting (there had been no BID Board Meetings in June or July 2017, so Ms. Becker, even if she
 27 had kept email notices of BID Board Meetings, would not have had them on July 31, 2017). Of
 28 course, an August 2017 email would never have been responsive to a July 31, 2017 CPRA request

1 for emails, so that would not have been produced even if Ms. Becker had it. But I immediately
 2 thought I had misread Riskin's July 31, 2017 CPRA request, because I had not interpreted it to
 3 seek emails in my possession to Ms. Becker, but rather, emails in Ms. Becker's possession.
 4 Consequently, I immediately invoked the deliberative process privilege in the event there were
 5 records that fell within that exemption. Upon further review of Riskin's actual request, I
 6 reconfirmed my interpretation of Riskin's July 31, 2017 CPRA request was correct, and
 7 reconfirmed to Riskin that my initial response was accurate.

8 23. It is my opinion, based upon my knowledge and experience of the BID renewal
 9 process, that making public pre-decisional emails to and from Mr. Gonzalez regarding the nature
 10 of the work and calculations that were being performed at that time by Urban Place Consulting
 11 Group Inc. would have profoundly impacted the BID renewal process, most significantly, creating
 12 conflict between and among the real property owners in the BID, and between the real property
 13 owners and me, over various potential special assessment methodologies when they were still in
 14 the formative or tentative stages and most of which were ultimately rejected. The quality of my
 15 policy decision making would have been reduced had I been required to make those policy
 16 decisions without the knowledgeable and experienced input from Urban Place Consulting Group,
 17 Inc., as I was attempting to make policy recommendations in the best interest of all real property
 18 owners in the BID.

19 24. In my 26 years of working for public agencies I have always been governed by
 20 some form of public transparency law just like the CPRA and appreciate the public's need for
 21 transparency; I have no objection to complying with the CPRA. The decisions I make about the
 22 exemptions which apply to Riskin's CPRA requests are not influenced by the fact that the CPRA
 23 requests are made by Riskin. I know that "Los Angeles Business Improvement Districts--Satan,
 24 Your Kingdom Must Come Down" is Riskin's tagline on his blog. I know that Riskin has vowed
 25 in writing to "destroy" the City of Los Angeles BIDs, accompanied by a photograph of a
 26 Hiroshima nuclear mushroom cloud, which he describes as an "effective, emotionally satisfying,
 27 and poetically just way to get rid of business improvement districts." I know Riskin brags about
 28 his true motive in inundating the Fashion District BID with CPRA requests—"I'm using the

1 contents of their own records to terrorize them.” He publicly demeans and degrades the Fashion
 2 BID employees, myself, and Board Members, about which he also concedes he has falsely
 3 attributed statements. I have had many, many communications, verbally and in writing, with
 4 Riskin before the particular CPRA requests at issue here, and I have a very strong opinion about
 5 his mental state. I know him to be abusive, dishonest, and he uses his michaelkohlhaas.org blog to
 6 insight others like him to abuse the BID and its employees and Board Members. I also know that
 7 Riskin posts the thousands of pages of records, including emails, that the BID has disclosed to him
 8 under the CPRA on archives.org under his blog name, michaelkohlhaas.org. But I have never let
 9 my personal feelings about Riskin interfere with my obligations under the CPRA.

10 25. The BID Board Members are volunteers not employees. They receive no
 11 remuneration, financial or otherwise, from the BID for their volunteer services. The BID has not
 12 previously provided a BID email domain for communications to or from these Board Members.
 13 The BID does not provide BID Board Members with a computer or access to a BID computer.
 14 The BID Board Members use either their private email domain, on their private computer, to
 15 communicate regarding BID business, if any. The BID does not pay for the BID Board
 16 Members’ computers, their internet access, or their domain names, nor does the BID reimburse for
 17 the costs relating thereto. The BID does not provide the BID Board Members with a computer or
 18 access to a BID computer. The BID has no right to control the private email domains and private
 19 computers of volunteer Board Members; nothing requires the Board Members to disclose or
 20 maintain their emails. The BID does not have actual or constructive possession of volunteer
 21 Board Members’ emails under their private domains on their private servers. The BID Board
 22 Members’ emails are not on the BID’s server, and neither the BID nor its contract IT has access to
 23 the BID Board Members’ emails. The Board Members’ emails on their private computers are not
 24 owned, used, maintained, created by or obtained by the BID, for a BID purpose or otherwise. The
 25 BID has no control of BID Board Members’ email communications, nor does the BID have a right
 26 to or constructive possession, custody or control of BID Board Members’ email communications.
 27 The BID does not pay for the BID Board Members’ computers, their internet access, or their
 28 domain names, nor does the BID reimburse for the costs relating thereto. Neither the BID nor I

1 have the power or authority to manage, direct or oversee the volunteer Board Members, much less
 2 their private emails and private computers. The Board Members' emails on their private
 3 computers are not owned, used, maintained, created by or obtained by the BID, for a BID purpose
 4 or otherwise. There is nothing in the BID's Articles of Incorporation, By Laws or policies which
 5 grant the BID actual or constructive possession, custody or control of BID Board Members' email
 6 communications and private computers, or requires BID Board Members to disclose or maintain
 7 their emails. A true and correct copy of the BID's Articles of Incorporation and By Laws are
 8 attached hereto as Exhibits 5 and 6, respectively.

9 26. The Agreement between the Downtown Los Angeles Property Owners Association
 10 and the City of Los Angeles (Exhibit 2) does not contain a public records retention requirement,
 11 much less an email retention policy. The very limited number of records that must be maintained
 12 are expressly delineated in the Agreement.

13 27. The proposed Skid Row Neighborhood Council, had it been authorized by voters
 14 within its proposed boundaries, would have been an advisory council to the Los Angeles City
 15 Council. The proposed boundaries of the Skid Row Neighborhood Council were not contiguous
 16 with the boundaries of the BID; real property parcels at the northern boundary of the BID
 17 overlapped with the proposed southern boundary of the Skid Row Neighborhood Council. For the
 18 same reason I try to notify real property owners of City of Los Angeles street closures in their
 19 area, I notified BID real property owners who would be within the proposed boundaries of the
 20 Skid Row Neighborhood Council of informational meetings and the date of voting. I did not
 21 notify them because it was BID business. The BID Board never discussed the Skid Row
 22 Neighborhood Council, and it was never on a Board meeting Agenda. When the City of Los
 23 Angeles was looking to secure polling places, the BID made its conference room available, but no
 24 BID staff was involved or in the conference room.

25 28. I have been dealing with Riskin for more than four years. He has become increasingly
 26 abusive towards me and my staff, and in fact, one of my staff resigned, one reason being that Riskin
 27 had posted abusive comments about her on his blog. I have Board members who will not deal with
 28 Riskin and have expressed concern that their and BID staff's security is threatened by him. For the

1 security of my employees, when Riskin is scheduled to be in the BID office to inspect records, I
2 require that he inspect records with a security guard present. Moreover, I have learned with time that
3 Riskin craves attention, and that giving him attention only encourages him to pontificate about his
4 knowledge of the law, his distorted version of the facts, and his accusations of illegal lobbying. So I
5 try to limit my communications with Riskin to only those communications that are legally required.
6 To be clear, neither I nor the BID are involved in illegally lobbying.

7 29. Debbie Welsch was an owner representative of real property owner Capital
8 Foresight LP, who served on the Board until March 2017, at which time she resigned.

9 30. Attached hereto as Exhibit 17 are true and correct copies of emails pertaining to
10 Riskin's May 17, 2017 CPRA requests.

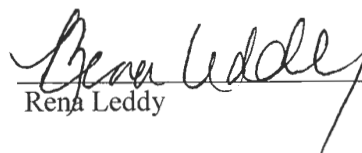
11 31. Attached hereto as Exhibit 18 are true and correct copies of emails pertaining to
12 Riskin's July 7, 2017 CPRA requests.

13 32. Attached hereto as Exhibit 19 are true and correct copies of emails pertaining to
14 Riskin's July 31, 2017 CPRA requests.

15 33. Between May 17, 2017 and July 31, 2017, excluding the three (3) CPRA requests at
16 issue here, the BID received twenty-six (26) CPRA requests from Riskin that the BID was trying to
17 respond to. In addition between May 17, 2017 and July 31, 2017, the BID was involved in
18 responding to eleven (11) CPRA requests from Riskin submitted prior to May 17, 2017.

19
20 I declare under penalty of perjury under the laws of the State of California that the foregoing
21 is true and correct.

22 Executed on this 28 day of May, 2019, at Los Angeles, California.

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25 Rena Leddy
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DECLARATION OF MARK LEVY

I, Mark Levy, declare as follows:

1. The facts stated herein are personally-known to me and I have first-hand knowledge thereof. If called upon to do so, I could and would testify hereto under oath.

2. I am the President and CEO of The City Market of Los Angeles Inc., a corporation that owns real property within the boundaries of the Fashion District BID.

3. As of May 17, 2017, I served as a volunteer on the BID Board of Directors. I was not then, nor have I ever been, an employee of the BID. I receive no remuneration from the BID for my volunteer service on the BID Board.

4. The BID does not provide me with a computer or access to a BID computer. The BID does not reimburse me for the use of my personal computer or email. When I send or receive email, I do so on my private email domain on my private computer. The BID does not have access to nor the right to control access to my private email domain and/or my private computer and/or private cell phone.

5. As of May 17, 2017, I did not have any email communications to or from southpark.la, dlanc.com, delsonproperties.com, South Park BID, DLANC, Delson, or Michael Delijani, in my private email that pertained to my role as a BID Board Member. I did not delete emails because of any CPRA request.

6. As of July 7, 2017, I did not have any email communication to or from Urban Place Consulting Inc. in my private email that pertained to my role as a BID Board Member. I did not delete email because of any CPRA request.

7. I do not keep emails after I have read them unless I need them for future use.


8. As does every other real property owner within the boundaries of the Fashion District BID, I have a right to communicate regarding issues of concern to me as a real property owner in the BID, and simply because I serve as a volunteer on the BID Board does not make those communications BID business or subject to the CPRA.

BRADLEY & GMEICH LLP

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 23 day of May, 2019, at Los Angeles, California.



Mark Levy

DECLARATION OF JESSICA LEWENSZTAIN

I, Jessica Lewensztain, declare as follows:

1. The facts stated herein are personally-known to me and I have first-hand knowledge thereof. If called upon to do so, I could and would testify hereto under oath.

2. I am the owner of ANJAC Fashion Buildings and a real property owner within the boundaries of the Fashion District BID.

3. As of May 17, 2017, I served as a volunteer on the BID Board of Directors. I was not then, nor have I ever been, an employee of the BID. I receive no remuneration from the BID for my volunteer service on the BID Board.

4. The BID does not provide me with a computer or access to a BID computer. The BID does not reimburse me for the use of my personal computer or email. When I send or receive email, I do so on my private email domain on my private computer. I do not invite contact or solicitation to my private email address and/or my private telephone number regarding BID business from real property owners in the BID or the public. The BID does not have access to nor the right to control access to my private email domain and/or my private computer and/or private cell phone.

5. As of May 17, 2017, I did not have any email communications to or from southpark.la, dlanc.com, delsonproperties.com, South Park BID, DLANC, Delson, or Michael Delijani, in my private email that pertained to my role as a BID Board Member. I did not delete emails because of any CPRA request.

6. As of July 7, 2017, I did not have any email communication to or from Urban Place Consulting Inc. in my private email that pertained to my role as a BID Board Member. I did not delete email because of any CPRA request.

7. I do not keep emails after I have read them unless I need them for future use.

8. As does every other real property owner within the boundaries of the Fashion District BID, I have a right to communicate regarding issues of concern to me as a real property owner in the BID, and simply because I serve as a volunteer on the BID Board does not make those communications BID business or subject to the CPRA.

1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct.

3 Executed on this 20 day of May, 2019, at LA, California.

4 *Jessica Lewensztain*
5 Jessica Lewensztain
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DECLARATION OF BRADLEY LUSTER

I, Bradley Luster, declare as follows:

1. The facts stated herein are personally-known to me and I have first-hand knowledge thereof. If called upon to do so, I could and would testify hereto under oath.

2. I am the owner of Major Properties and a real property owner within the boundaries of the Fashion District BID.

3. As of May 17, 2017, I served as a volunteer on the BID Board of Directors. I was not then, nor have I ever been, an employee of the BID. I receive no remuneration from the BID for my volunteer service on the BID Board.

4. The BID does not provide me with a computer or access to a BID computer. The BID does not reimburse me for the use of my personal computer or email. When I send or receive email, I do so on my private email domain on my private computer. I do not invite contact or solicitation to my private email address and/or my private telephone number regarding BID business from real property owners in the BID or the public. The BID does not have access to nor the right to control access to my private email domain and/or my private computer and/or private cell phone.

5. As of May 17, 2017, I did not have any email communications to or from southpark.la, dlanc.com, delsonproperties.com, South Park BID, DLANC, Delson, or Michael Delijani, in my private email that pertained to my role as a BID Board Member. I did not delete emails because of any CPRA request.

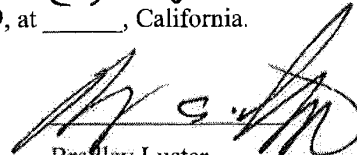
6. As of July 7, 2017, I did not have any email communication to or from Urban Place Consulting Inc. in my private email that pertained to my role as a BID Board Member. I did not delete email because of any CPRA request.

7. I do not keep emails after I have read them unless I need them for future use.

8. As does every other real property owner within the boundaries of the Fashion District BID, I have a right to communicate regarding issues of concern to me as a real property owner in the BID, and simply because I serve as a volunteer on the BID Board does not make those communications BID business or subject to the CPRA.

1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct.

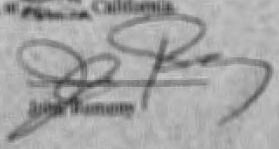
3 Executed on this 20 day of May, 2019, at LOS ANGELES, California.

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5 Bradley Luster

DECLARATION OF JOHN HENNING

I, John Henning, declare as follows:

1. The facts stated herein are personally known to me and I have first-hand knowledge thereof. If called upon to do so, I could and would testify herein under oath.
2. I am a shareholder in Harry Leather and a real property owner within the boundaries of the Madison District BID.
3. As of May 17, 2017, I served as a volunteer on the BID Board of Directors. I was not then, nor have I ever been, an employee of the BID. I receive no remuneration from the BID for my volunteer service on the BID Board.
4. The BID does not provide me with a computer or access to a BID computer. The BID does not reimburse me for the use of my personal computer or e-mail. When I send or receive e-mail, I do so on my private e-mail domain on my private computer. I do not invite comment or solicitation to my private e-mail address and/or my private telephone number regarding BID business from real property owners in the BID or the public. The BID does not have access to nor the right to control access to my private e-mail domain and/or my private computer and/or private cell phone.
5. As of May 17, 2017, I did not have any e-mail communications to or from wallypack, llc, diana.com, dillandproperties.com, South Park BID, SE, ANC, Carlson, or Michael Deliparis, or my private e-mail that pertained to my role as a BID Board Member. I did not delete e-mail because of any CPRA request.
6. As of July 15, 2017, I did not have any e-mail communications to or from Urban Plan Consulting Inc. in my private e-mail that pertained to my role as a BID Board Member. I did not delete e-mail because of any CPRA request.
7. I do not keep e-mails after I have read them unless I need them for future use.
8. As does every other real property owner within the boundaries of the Madison District BID, I have a right to communicate regarding issues of concern to me as a real property owner in the BID, and simply because I serve as a volunteer on the BID Board does not make those communications BID business or subject to the CPRA.

1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct.
3 Executed on this 21st day of May, 2018, at San Jose, California.
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5 John Ramirez
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DECLARATION OF LAURIE ROSEN

I, Laurie Rosen, declare as follows:

1. The facts stated herein are personally-known to me and I have first-hand knowledge thereof. If called upon to do so, I could and would testify hereto under oath.

2. I am an owner of Academy Awards Clothes, Inc., and a real property owner within the boundaries of the Fashion District BID.

3. As of May 17, 2017, I served as a volunteer on the BID Board of Directors. I was not then, nor have I ever been, an employee of the BID. I receive no remuneration from the BID for my volunteer service on the BID Board.

4. The BID does not provide me with a computer or access to a BID computer. The BID does not reimburse me for the use of my personal computer or email. When I send or receive email, I do so on my private email domain on my private computer. The BID does not have access to nor the right to control access to my private email domain and/or my private computer and/or private cell phone.

5. As of May 17, 2017, I did not have any email communications to or from southpark.la, dlanc.com, delsonproperties.com, South Park BID, DLANC, Delson, or Michael Delijani, in my private email that pertained to my role as a BID Board Member. I did not delete emails because of any CPRA request.

6. As of July 7, 2017, I did not have any email communication to or from Urban Place Consulting Inc. in my private email that pertained to my role as a BID Board Member. I did not delete email because of any CPRA request.

7. I do not keep emails after I have read them unless I need them for future use.

8. As does every other real property owner within the boundaries of the Fashion District BID, I have a right to communicate regarding issues of concern to me as a real property owner in the BID, and simply because I serve as a volunteer on the BID Board does not make those communications BID business or subject to the CPRA.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

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Executed on this 23rd day of May, 2019, at Los Angeles, California.



Laurie Rosen

DECLARATION OF LAURIE SALE

I, Laurie Sale, declare as follows:

1. The facts stated herein are personally-known to me and I have first-hand knowledge thereof. If called upon to do so, I could and would testify hereto under oath.

2. I am one of the owners of SCS Building Fund LLC and a real property owner within the boundaries of the Fashion District BID.

3. As of May 17, 2017, I served as a volunteer on the BID Board of Directors. I was not then, nor have I ever been, an employee of the BID. I receive no remuneration from the BID for my volunteer service on the BID Board.

4. The BID does not provide me with a computer or access to a BID computer. The BID does not reimburse me for the use of my personal computer or email. When I send or receive email, I do so on my private email domain on my private computer. The BID does not have access to nor the right to control access to my private email domain and/or my private computer and/or private cell phone.

5. As of May 17, 2017, I did not have any email communications to or from southpark.la, dlanc.com, dlancproperties.com, South Park BID, DLANC, Nelson, or Michael Delijani, in my private email that pertained to my role as a BID Board Member. I did not delete emails because of any CPRA request.

6. As of July 7, 2017, I did not have any email communication to or from Urban Place Consulting Inc. in my private email that pertained to my role as a BID Board Member. I did not delete email because of any CPRA request.

7. I do not keep emails after I have read them unless I need them for future use.

8. As does every other real property owner within the boundaries of the Fashion District BID, I have a right to communicate regarding issues of concern to me as a real property owner in the BID, and simply because I serve as a volunteer on the BID Board does not make those communications BID business or subject to the CPRA.

BRADLEY & GMECH LLP

1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct.

3 Executed on this 21 day of May, 2019, at Los Angeles, California.

4
5 
6 Laurie Sale

BRADLEY & GMEICH LLP

DECLARATION OF SUZETTE WACHTEL

I, Suzette Wachtel, declare as follows:

1. The facts stated herein are personally-known to me and I have first-hand knowledge thereof. If called upon to do so, I could and would testify hereto under oath.

2. I am the owner of Wachtel Properties and a real property owner within the boundaries of the Fashion District BID.

3. As of May 17, 2017, I served as a volunteer on the BID Board of Directors. I was not then, nor have I ever been, an employee of the BID. I receive no remuneration from the BID for my volunteer service on the BID Board.

4. The BID does not provide me with a computer or access to a BID computer. The BID does not reimburse me for the use of my personal computer or email. When I send or receive email, I do so on my private email domain on my private computer. I do not invite contact or solicitation to my private email address and/or my private telephone number regarding BID business from real property owners in the BID or the public. The BID does not have access to nor the right to control access to my private email domain and/or my private computer and/or private cell phone.

5. As of May 17, 2017, I did not have any email communications to or from southpark.la, dlanc.com, delsonproperties.com, South Park BID, DLANC, Delson, or Michael Delijani, in my private email that pertained to my role as a BID Board Member. I did not delete emails because of any CPRA request.

6. As of July 7, 2017, I did not have any email communication to or from Urban Place Consulting Inc. in my private email that pertained to my role as a BID Board Member. I did not delete email because of any CPRA request.

7. I do not keep emails after I have read them unless I need them for future use.

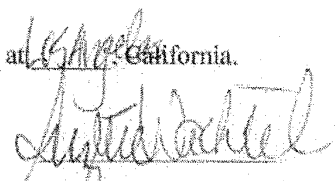
8. As does every other real property owner within the boundaries of the Fashion District BID, I have a right to communicate regarding issues of concern to me as a real property owner in the BID, and simply because I serve as a volunteer on the BID Board does not make those communications BID business or subject to the CPRA.

BRADLEY & GMEICH LLP

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 20 day of May, 2019, at Los Angeles, California.


Suzette Wachtel